

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EYOB E AMBERBER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

EHANG HOLDINGS LIMITED, HUAZHI
HU, RICHARD JIAN LIU, and EDWARD
HUAXIANG LU,

Defendants.

Case No. 1:21-cv-01392-GBD

CLASS ACTION

VIVIAN CHAUMONT, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

EHANG HOLDINGS LIMITED, HUAZHI
HU, RICHARD JIAN LIU, and EDWARD
HUAXIANG LU,

Defendants.

Case No. 1:21-cv-01526-GBD

CLASS ACTION

NOTICE OF RELATED ACTION

Lead Plaintiff Movant Sergiu Rata hereby notifies the Court that on May 19, 2021, a third related action was transferred to this Court from the U.S. District Court for the Central District of California. *See Klein v. EHang Holdings Ltd., et al.*, No. 1:21-cv-04484-UA (S.D.N.Y.), which was Case No. 2:21-cv-01811-JFW-PVC (C.D. Cal.). The *Klein* action asserts identical claims against identical defendants as the above-captioned *Amberber* and *Chaumont* actions. In his Order transferring the *Klein* matter to this Court, Judge Walter noted, *inter alia*, that *Amberber*, *Chaumont*, and *Klein* “involve virtually identical issues” and “are likely to be consolidated.” *See Klein*, Case No. 2:21-cv-01811-JFW-PVC (C.D. Cal.), Order Transferring Action to United States District Court for the Southern District of New York, ECF No. 79 (attached as Ex. A hereto).¹

In his pending Motion for Consolidation, Appointment as Lead Plaintiff, and Approval of Selection of Lead Counsel (ECF No. 38), Mr. Rata seeks consolidation of the above-captioned *Amberber* and *Chaumont* actions. Mr. Rata respectfully submits that the Court should also consolidate the newly-transferred *Klein* matter into the first-filed *Amberber* docket.

Dated: May 19, 2021

Respectfully submitted,

/s/ Jeffrey C. Block

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¹ Indeed, the *Klein* matter has already been referred to Judge Daniels (*see Klein*, Case No. 1:21-cv-4484-UA, Dkt. Entry on May 19, 2021).

CERTIFICATE OF SERVICE

I hereby certify that on May 19, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Jeffrey C. Block

Jeffrey C. Block